

Subject - Dismiss NPRM 16-239 immediately.

From - Robert Rennard, FCC extra class licensee N7WY since 1976, operated as K7SAL from 1962 to 1976 before upgrading.

The FCC released 16-96 on July 28, 2016 regarding Docket WT 16-239

In paragraph 8, The FCC says, "... we propose to remove the baud rate limits in Section 97.307(f)". Which is motivated by (from the same paragraph) the FCC's claim that, "... removing the baud rate restriction could encourage individuals to more fully utilize the amateur service in experimentation and could promote innovation, more efficient use of the radio spectrum currently allocated to the amateur service, and the ability of the amateur service to support public safety efforts in the event of an emergency..."

With regard to experimentation and innovation, this is already underway within the existing bandwidth limitations of 97.307(f). K1JT and others have made great progress and are highly regarded within the community of amateur operators for their use of narrow bandwidths to provide highly reliable communications.

With regard to more efficient use, somebody asked me why we still use Morse code. I showed them the occupied spectrum of a CW signal vs that of a voice signal. How can allowing an emission that occupies a large part of the allocated amateur radio spectrum provide efficiency in the greater sense? Yes, it may be more efficient for one conversation, but what about the damage that broadband use of spectrum does to other conversations using narrowband techniques? It is just jamming.

With regard to supporting communications in the event of an emergency, we have to be ready at a moment's notice to deploy with what we have at hand. I feel that the mantra, "keep it simple, stupid", will always apply. Voice and Morse are simple, well known and save the day when complexity precludes interaction.

Paragraph 7 states, "...we seek comment on the reasons supporting such a view". I find it odd that the FCC did not solicit opinions opposing the view. Add me to the substantial list of FCC licensed amateur radio operators who ask the FCC to dismiss Docket WT 16-639.

In paragraph 14, the FCC recognizes that it must comply with the Regulatory Flexibility Act, which sadly addresses only the impacts on small businesses, not the population of amateur radio operators who are at odds with the non-representative positions of the American Radio Relay League (ARRL).

I hope that the FCC is able to ignore comments about the Docket provided by those with commercial interests in support of this Docket. The developers of Pactor 4 for example have argued that those skilled in the art can intercept Pactor 4, but wasn't the original design objective of Pactor 4 in addition to higher symbol rate to provide obfuscation of the exchanged content? I find it foreign to the intent of 97.1 to allow connectivity by amateur operators to e-mail and web services implemented by robotic systems.

Sincerely,

Robert Rennard, N7WY